

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

FAURECIA SISTEMAS
AUTOMOTRICES DE MEXICO
SA DE CV,

Case No. 2:23-CV-10763

Plaintiff,

v.

Hon. Gershwin A. Drain

CAMACO, LLC,

Defendant.

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**RESPONSE TO PLAINTIFF'S MOTION
TO EXPEDITE CONSIDERATION
OF PLAINTIFF'S TO STAY AND ENJOIN ARBITRATION**

Defendant Camaco, LLC, ("Camaco") by and through its undersigned counsel, hereby responds to the Motion for Expedited Consideration of Plaintiff's Motion to Stay and Enjoin Arbitration, filed by Plaintiff Faurecia Sistemas Automotrices de Mexico SA de CV ("Plaintiff" or "Forvia").

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QUESTION PRESENTED

1. Is Forvia's request for expedited consideration of its Motion to Stay and Enjoin Arbitration moot as a result of the parties' agreement to hold the arbitration in abeyance pending the Court's ruling on Forvia's Motion to Stay?

Defendant Camaco Answers: Yes
The Court should answer: Yes

CONTROLLING AND MOST APPROPRIATE AUTHORITY

Fed. R. Civ. P. 6(c)(1)(C)

BRIEF IN SUPPORT

Camaco hereby incorporates and refers the Court to Camaco's Response to Forvia's Motion to Stay and Enjoin Arbitration (ECF No. 11, PageID.206 *et seq*). for a fuller explanation of the relevant facts and circumstances leading to this dispute, as well as an explanation as to why these parties and this dispute is subject to an existing arbitration agreement.

For purposes of Forvia's instant Motion to Expedite, while Camaco maintains that the arbitration should proceed as filed by Camaco, the parties have reached an agreement in principle to hold the arbitration in abeyance pending the Court's resolution of Forvia's pending Motion. Counsel is in the process of drafting a joint letter to the American Arbitration Association to inform the AAA of this request. This renders moot Forvia's request for expedited consideration, and also removes the only justification Forvia asserted for that request—i.e. that, absent immediate consideration, the arbitration will be proceeding.

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